

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SARA COOMBS-MORENO, REMO DELLO IOIO,
ELIZBETH LOIACONO, SUZANNE DEEGAN,
MARITZA ROMERO, JULIA HARDING, CHRISTINE
O'REILLY, AYSE P. USTARES, JESUS COOMBS,
ANGELA VELEZ, SANCHIA BROWNE, AMOURA
BRYAN, ZENA WOUADJOU, CHARISSE RIDULFO,
TRACY-ANN FRANCIS MARTIN, KAREEM
CAMPBELL, MICHELLE HEMMINGS HARRINGTON,
MARK MAYNE, CARLA GRANT, OPHELA INNISS,
CASSANDRA CHANDLER, AURA MOODY, EVELYN
ZAPATA, SEAN MILAN, SONIA HERNANDEZ,
BRUCE REID, JOSEPH RULLO, AND CURTIS BOYCE,
JOSEPH SAVIANO, MONIQUE MORE, NATALYA
HOGAN, JESSICA CSEPKU, ROSEANNE
MUSTACCHIA, YULONDA SMITH, MARIA FIGARO,
RASHEEN ODOM, FRANKIE TROTMAN, EDWARD
WEBER, MERVILYN WALLEN, PAULA SMITH,
CHRISTIAN MURILLO, LYNDSEY WANSER,
JOSEPH SAVIANO, MARVILYN WALLEN,
CHRISTIAN MURILLO, DAWN SCHOL, SUZANNE
SCHROETER, SARAH WIESEL, ALTHEA BRISSETT,
TRACEY HOWARD, MARC ROSIELLO, AUDREY
DENNIS, MARIE JOSEPH, PATRICIA CATOIRE,
SALLY MUSSAFI, COLETTE CAESAR, BERTRAM
SCOTT, DIANE PAGEN, STELLA M. PRESTON,
RACHELLE GARCIA, JULIE LAWLEY, SUSANNE
PHILLIP, MARIA ESTRADA, AND JENNETTE
FRAZER, individually and on behalf of similarly situated
individuals,

Plaintiffs,

v.

THE CITY OF NEW YORK, MAYOR ERIC L. ADAMS,
FORMER MAYOR BILL deBLASIO,
COMMISSIONER ASHWIN VASAN, MD, PHD, AND
FORMER COMMISSIONER DAVE A. CHOKSHI, M.D.,
MSC., DEPARTMENT OF HEALTH AND MENTAL
HYGIENE, DEPARTMENT OF EDUCATION AND
DOES 1-20

Defendants

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

INDEX No.:1:22 CV 02234-EK-LB

TO: OPPOSING COUNSEL PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annex thereto, I Jo Saint-George will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States of District Courts for the Eastern District of New York for an order allowing the admission of movant, a member of the non- profit civil liberties and social justice organization Women of Color For Equal Justice and a member in good standing of the bar of the State of Arizona, as attorney pro hac vice to argue or try this case in whole or in part as counsel for the proposed class of Plaintiffs.

There are no pending disciplinary proceedings against me in any state or federal court.

Dated: January 19, 2024

Respectfully submitted,

/s/ *Jo Saint-George*

Jo Saint-George, Esq.
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Bowie MD 20721-1246
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Counsel for Plaintiffs